

To: Lenny Young, FP Division Manager

From: Gary Graves, FP Assistant Division Manager - Operations

Subject: NW Region Audit Team findings

Date: February 22, 2006

I want to thank the NW Region Forest Practice staff for their willingness to candidly answers to the audit questions.

Findings:

- ☞ The ID Teams were all conducted in accordance with current procedures.
 - ☞ All of the FPAs reviewed were complete when accepted by the region.
 - ☞ All FPAs were approved, approved with conditions or disapproved within the allotted time.
 - ☞ The penalties for 2 of the 3 CPs issued, the region had correctly determined the assessed penalty. The third CP was missing the calculation sheet so the audit team could not verify the information.
 - ☞ The review of the selected RMAPs and documents showed that they were in compliance with the even-flow principles.
 - ☞ Generally the region is attempting to implement all of the forest practice rules. Several rules such as reforestation receive little attention from region staff.
 - ☞ The majority of the FPAs, 18 of 20, were correctly classed on the decision date. One FPA was disapproved as it was misclassified. The applicant withdrew the remaining FPA prior to decision date.
 - ☞ The region issued the correct enforcement document in the majority of the enforcement action taken, 66%. Several of the documents were unclear and confusing as what the department was directing the recipient to do.
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- The big-ticket item is the overall lack of documentation in all phases of the program implementation in NW Region.
 - Initial FPA processing identified elements that needed to be field verified by the Forest Practice Foresters. Documentation could only be found on one Class IV Special that a field visit took place. Several of the remaining FPAs were approved without the verification.
 - The FP Coordinator, who is responsible for managing the processing of the FPAs, only reviews the Class IV Generals and Specials applications.
 - The Forest Practice Foresters were not able to provide any evidence of conducting field checks of any type, pre-approval, post approval or close out, during the audit process.
 - The forest practices forester left the impression with reviewers that documentation of events associated with site visits was not an important element within the duties of their positions.
 - Many of the approved FPAs reviewed were conditioned. Many times the conditions were just a restatement of the forest practice rules not additional

- element needs to ensure resources protection. Eight of the FPAs were conditioned appropriately while the remaining nine FPAs were not.
- Two of the FPAs involved cultural resources and should have required a meeting between landowner and affected tribe. The FPA was approved with no documentation verifying that the meeting had occurred.
 - The region has no written criteria as to when to conduct an ID Team review other than those required by rules, i.e. Alternate Plans.
 - There was no indication that the region knew about the ID Team training material developed by Gary Graves a few years ago. The region should consider reviewing it at one of their district meetings as a refresher on what an ID team is and how to conduct them.
 - The region has no formal training process for how or when to conduct ID Teams.
 - The Division may need to help to clarify the distinction between “official ID team” vs. the pre application reviews and site visits by interested parties with the FPF.
 - Generally the FP staff is aware of and has correctly handled sensitive information. Identifying what is sensitive information and how to handle this information should be placed in a desk manual for future reference for current employees. The region should continue to provide discussion and refresher training at District meetings to ensure a clear understanding is maintained. Region appeared to be unaware of the sensitive information training provided them in 2005.
 - It was generally felt that a GIS layer should be developed, which would be reviewed during the approval process. The question is the cost worth the benefit to create a tracking system?
 - The region has no “system” established to guide the foresters in determining compliance priorities.
 - Not all foresters were aware of the Region/Division required compliance deliverables. Documentation by foresters of their compliance visits does not seem to be a priority.
 - Documentation improvement is needed; DM mentioned the region is working on a field visit form for the foresters to use. Good documentation is part of the forest practice job. Training/review and guidance is necessary.
 - Some foresters make trades on the ground after a violation may have occurred without written documentation or enforcement action being taken.

Clarifying comments from Bill Wallace and Nancy Joseph after a review of the audit findings:

- ➡ Most of our foresters participated in the ID Team Training and should have received any training materials.
- ➡ All of the foresters have seen copies of the deliverables. Bill and Nancy have talked to staff about outcomes, rather than the number of visits that they need to make. They believe the resultant number of visits would meet the deliverables.